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January 20, 2023

BY ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 11D
New York, NY 10007

Re: *Fairstein v. Netflix, Inc.*, 1:20-CV-8042 (PKC)
Request to Supplement Record

Dear Judge Castel:

The undersigned represents Plaintiff Linda Fairstein (“Plaintiff”) in the above-referenced action. We submit this letter to request the Court’s permission to supplement the record filed in support of Plaintiff’s opposition to Defendants’ summary judgment motion. *See* ECF No. 185.

More specifically, when addressing Defendants’ recent pre-motion letter it came to our attention that only “Part 1” of Plaintiff’s Exhibit 36 was uploaded to the docket on November 30, 2022. ECF No. 185-61. Exhibit 36, which is an exhibit used at Robin Swicord’s deposition, is a large pdf which had to be broken into four parts to meet ECF requirements. This is indicated on the cover page, which states “Exhibit 36, Parts 1-4.” We inadvertently failed to upload Parts 2-4 on the filing date. We respectfully request the Court’s permission to supplement the record by uploading a complete copy of Exhibit 36, Parts 1-4, to the docket.

We also wanted to bring to the Court’s attention that complete copies of Plaintiff’s Exhibits 37 (ECF Nos. 182-61 and 182-62) and 151 (ECF Nos. 182-164 and 182-165) were filed on the public docket but only Part 1 (of 2) of these exhibits were filed under seal.

We apologize for any inconvenience that this may have caused and appreciate the Court’s

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Hon. P. Kevin Castel
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consideration of this matter.

Respectfully Submitted,

By: /s/ Kara L. Gorycki

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